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February 16, 2004

Mr. Scott Beer
Director
Industry and Corporate Affairs
ICG Telecom Group
161 Inverness Drive West, Suite 100
Englewood, CO 80112

Re: Review of Federal Communications Commission's Triennial Review Order
Regarding Unbundling Requirements for Individual Network Elements
PSC 2003-00379

Dear Mr. Beer:

In accordance with the Commission's February 9, 2004 Order, enclosed are BellSouth's Data Requests directed to ICG Telecom Group. If the answers to Questions 1 and 2 are "None", you do not need to answer the remaining questions.

Thank you very much for your assistance in this matter.

Yours very truly,

A handwritten signature in black ink, appearing to read "Dorothy J. Chambers".

Dorothy J. Chambers

Enclosures

cc: Thomas M. Dorman, Executive Director
Kentucky Public Service Commission

527422

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

REVIEW OF FEDERAL COMMUNICATIONS)	
COMMISSION'S TRIENNIAL REVIEW ORDER)	CASE NO.
REGARDING UNBUNDLING REQUIREMENTS)	2003-00379
FOR INDIVIDUAL NETWORK ELEMENTS)	

BELLSOUTH TELECOMMUNICATIONS, INC.'S
DATA REQUESTS TO ICG TELECOM GROUP FOR THE
IMPAIRMENT OF LOCAL SWITCHING FOR MASS MARKET

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to the Commission's February 9, 2004 Order in this case, hereby serves its Data Requests to ICG Telecom Group ("ICG"). If your response to both Data Request 1 and Data Request 3 is "none," you do not need to answer the remaining questions. Incorporated by reference are the Instructions and Definitions set out in BellSouth's discovery filed October 10, 2003 and November 24, 2003.

DATA REQUESTS

1. Identify each switch owned by ICG that ICG uses to provide a qualifying service anywhere in Kentucky, irrespective of whether the switch itself is located in the State and regardless of the type of switch (e.g., circuit switch, packet switch, soft switch, host switch, remote switch).

RESPONSE:

2. For each switch identified in response to Data Request No. 1, please:
- (a) provide the Common Language Location Identifier (“CLLI”) code of the switch;
 - (b) provide the street address, including the city and state in which the switch is located;
 - (c) identify the type of switch by manufacturer and model (e.g., Nortel DMS100);
 - (d) state the total capacity of the switch by providing the maximum number of voice-grade equivalent lines the switch is capable of serving, based on the switch’s existing configuration and component parts;
 - (e) state the number of voice-grade equivalent lines the switch is currently serving based on the switch’s existing configuration and component parts; and
 - (f) provide information relating to the switch as contained in Telcordia’s Local Exchange Routing Guide (“LERG”); or, state if the switch is not identified in the LERG.

RESPONSE:

3. Identify any other switch not previously identified in Data Request No. 1 that ICG uses to provide a qualifying service anywhere in Kentucky, irrespective of whether the switch itself is located in the State and regardless of the type of switch (e.g., circuit switch, packet switch, soft switch, host switch, remote switch). In answering this Data Request, do not include ILEC switches used by ICG either on an unbundled or resale basis.

RESPONSE:

4. For each switch identified in response to Data Request No. 3, please:
- (a) identify the person that owns the switch;
 - (b) provide the Common Language Location Identifier (“CLLI”) code of the switch;
 - (c) provide the street address, including the city and state in which the switch is located;
 - (d) identify the type of switch by manufacturer and model (e.g., Nortel DMS100);
 - (e) describe in detail the arrangement by which you are making use of the switch, including stating whether you are leasing the switch or switching capacity on the switch;

- (f) identify all documents referring or relating to the rates, terms, and conditions of ICG's use of the switch; and
- (g) provide information relating to the switch as contained in Telcordia's Local Exchange Routing Guide ("LERG"); or, state if the switch is not identified in the LERG.

RESPONSE:

- 5. Identify by name, address, and CLLI code each ILEC wire center area, i.e., the territory served by the wire center, in which you provide qualifying service to any end user customers in Kentucky utilizing any of the switches identified in response to Data Request No. 1. If you assert that you cannot identify or do not know how to ascertain the boundaries of a wire center area, provide the requested information for the ILEC exchange in which your end user customer is located.

RESPONSE:

6. For each ILEC wire center area identified in the foregoing Data Request (or ILEC exchange if you do not provide the information by wire center area) identify the total number of voice-grade equivalent lines you are providing to end user customers in that wire center area from the switches identified in response to Data Request 1.

RESPONSE:

7. With regard to the voice-grade equivalent lines identified by ILEC wire center area (or ILEC exchange) in response to Data Request 6, separate the lines by end user and end user location in the following manner:
 - (a) The number of end user customers to whom you provide one (1) voice-grade equivalent line;
 - (b) The number of end user customers to whom you provide two (2) voice-grade equivalent lines;
 - (c) The number of end user customers to whom you provide three (3) voice-grade equivalent lines;
 - (d) The number of end user customers to whom you provide four (4) voice-grade equivalent lines;
 - (e) The number of end user customers to whom you provide five (5) voice-grade equivalent lines;

- (f) The number of end user customers to whom you provide six (6) voice-grade equivalent lines;
- (g) The number of end user customers to whom you provide seven (7) voice-grade equivalent lines;
- (h) The number of end user customers to whom you provide eight (8) voice-grade equivalent lines;
- (i) The number of end user customers to whom you provide nine (9) voice-grade equivalent lines;
- (j) The number of end user customers to whom you provide ten (10) voice-grade equivalent lines;
- (k) The number of end user customers to whom you provide eleven (11) voice-grade equivalent lines;
- (l) The number of end user customers to whom you provide twelve (12) voice-grade equivalent lines; and
- (m) The number of end user customers to whom you provide more than twelve (12) voice-grade equivalent lines;

RESPONSE:

8. Identify by name, address, and CLLI code each ILEC wire center area, i.e., the territory served by the wire center, in which you provide qualifying service to any end user customers in Kentucky utilizing any of the switches identified in response to Data Request No. 3. If you assert that you cannot identify or do not know how to ascertain the boundaries of a wire center area, provide the requested information for the ILEC exchange in which your end user is located.

RESPONSE:

9. For each ILEC wire center area identified in the foregoing Data Request (or ILEC exchange if you do not provide the information by wire center area) identify the total number of voice-grade equivalent lines you are providing to end user customers in that wire center area from the switches identified in response to Data Request No. 3.

RESPONSE:

10. With regard to the voice-grade equivalent lines identified by ILEC wire center area (or ILEC exchange) in response to Data Request 9, separate the lines by end user and end user location in the following manner:

- (a) The number of end user customers to whom you provide one (1) voice-grade equivalent line;
- (b) The number of end user customers to whom you provide two (2) voice-grade equivalent lines;
- (c) The number of end user customers to whom you provide three (3) voice-grade equivalent lines;
- (d) The number of end user customers to whom you provide four (4) voice-grade equivalent lines;
- (e) The number of end user customers to whom you provide five (5) voice-grade equivalent lines;
- (f) The number of end user customers to whom you provide six (6) voice-grade equivalent lines;
- (g) The number of end user customers to whom you provide seven (7) voice-grade equivalent lines;
- (h) The number of end user customers to whom you provide eight (8) voice-grade equivalent lines;
- (i) The number of end user customers to whom you provide nine (9) voice-grade equivalent lines;
- (j) The number of end user customers to whom you provide ten (10) voice-grade equivalent lines;
- (k) The number of end user customers to whom you provide eleven (11) voice-grade equivalent lines;

- (l) The number of end user customers to whom you provide twelve (12) voice-grade equivalent lines; and
- (m) The number of end user customers to whom you provide more than twelve (12) voice-grade equivalent lines;

RESPONSE:

11. Identify by name, address, and CLLI code each ILEC wire center area, i.e., the territory served by the wire center, in which you provide qualifying service to any end user customers in Kentucky using an ILEC's switch either on an unbundled or resale basis. If you assert that you cannot identify or do not know how to ascertain the boundaries of a wire center area, provide the requested information for the ILEC exchange in which your end user customer is located.

RESPONSE:

12. For each ILEC wire center area identified in the foregoing Data Request (or ILEC exchange if you do not provide the information by wire center area) identify the total number of voice-grade equivalent lines you are providing to end user customers in that wire center area using an ILEC's switch either on an unbundled or resale basis.

RESPONSE:

13. With regard to the voice-grade equivalent lines identified by ILEC wire center area (or ILEC exchange) in response to Data Request 12, separate the lines by end user and end user location in the following manner:
- (a) The number of end user customers to whom you provide one (1) voice-grade equivalent line;
 - (b) The number of end user customers to whom you provide two (2) voice-grade equivalent lines;
 - (c) The number of end user customers to whom you provide three (3) voice-grade equivalent lines;
 - (d) The number of end user customers to whom you provide four (4) voice-grade equivalent lines;
 - (e) The number of end user customers to whom you provide five (5) voice-grade equivalent lines;

- (f) The number of end user customers to whom you provide six (6) voice-grade equivalent lines;
- (g) The number of end user customers to whom you provide seven (7) voice-grade equivalent lines;
- (h) The number of end user customers to whom you provide eight (8) voice-grade equivalent lines;
- (i) The number of end user customers to whom you provide nine (9) voice-grade equivalent lines;
- (j) The number of end user customers to whom you provide ten (10) voice-grade equivalent lines;
- (k) The number of end user customers to whom you provide eleven (11) voice-grade equivalent lines;
- (l) The number of end user customers to whom you provide twelve (12) voice-grade equivalent lines; and
- (m) The number of end user customers to whom you provide more than twelve (12) voice-grade equivalent lines;

RESPONSE:

14. Do you offer to provide or do you provide switching capacity to another local exchange carrier for its use in providing qualifying service anywhere in the nine states in the BellSouth region. If the answer to this Data Request is in the affirmative, for each switch that you use to offer or provide such switching capacity, please:
- (a) Provide the Common Language Location Identifier (“CLLI”) code of the switch;
 - (b) Provide the street address, including the city and state in which the switch is located;
 - (c) Identify the type of switch by manufacturer and model (e.g., Nortel DMS100);
 - (d) State the total capacity of the switch by providing the maximum number of voice-grade equivalent lines the switch is capable of serving, based on the switch’s existing configuration and component parts;
 - (e) State the number of voice-grade equivalent lines the switch is currently serving based on the switch’s existing configuration and component parts; and
 - (f) Identify all documents referring or relating to the rates, terms, and conditions of ICG’s provision of switching capability.

RESPONSE:

The undersigned verifies that the above answers are correct based on information and belief.

Signature

Name

STATE OF _____)
COUNTY OF _____)

I, the undersigned, a Notary Public in and for the State and County aforesaid, do hereby certify that the foregoing document was presented before me by _____, who is personally known to me, and I further certify that he signed and acknowledged the same to be his true act and deed in due form of law.

WITNESS, my hand and official this the _____ day of _____, 2004.

NOTARY PUBLIC

My Commission Expires: _____

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Dorothy J. Chambers", written over a horizontal line.

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